

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**DOLORES TAPIA, on her own behalf and  
as mother, general guardian, and next friend  
of S.T. and G.T.,**

**Plaintiffs,**

**v.**

**Case No. 1:14-cv-00510 KG/RHS**

**CITY OF ESPANOLA, CITY OF ESPANOLA  
POLICE DEPARTMENT, and JOHN VIGIL,**

**Defendants.**

**PLAINTIFF'S EXPERT WITNESS DISCLOSURE**

COMES NOW Plaintiff, Dolores Tapia, by and through her attorneys of record, and hereby discloses her intent to call the following expert witness:

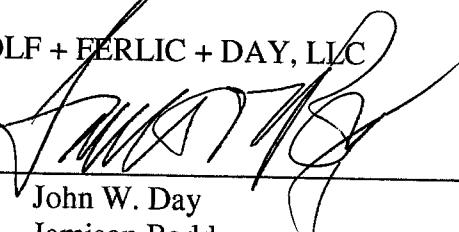
Thomas Grover, J.D., M.P.A.  
9400 Holly NE, Bldg. 4  
Albuquerque, NM 87122  
(505) 463-9336

Mr. Grover will testify, based on his experience and training, regarding law enforcement procedures, standards, practices, tactics, and training as they relate to Officer Vigil's conduct as alleged in Plaintiff's complaint on the date of the incident in question including, but not limited to, use of force. Mr. Grover may testify to any other matters discussed or contained in his forthcoming report.

Plaintiff may also call any expert witness needed for rebuttal testimony, the need for which cannot be anticipated at this time.

Respectfully submitted,

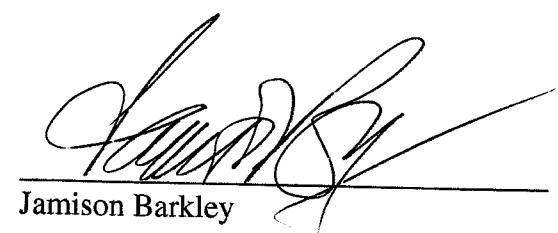
EGOLF + FERLIC + DAY, LLC

By: 

John W. Day  
Jamison Barkley  
128 Grant Ave., Third Floor  
Santa Fe, NM 87501  
(505) 986-9641  
*Attorneys for Plaintiffs*

#### **CERTIFICATE OF SERVICE**

I hereby certify that, on this 19th of November, 2014, I filed the foregoing Plaintiff's Expert Witness Disclosure through the Court's CM/ECF system, which caused the below-listed counsel to be served by electronic means, as more fully reflected on the notice of electronic filing.

  
Jamison Barkley

Basham & Basham, P.C.  
Mark A. Basham  
2205 Miguel Chavez Rd. #A  
Santa Fe, NM 87505  
mbasham@bbpcnm.com